#### REPORTS ANALYSIS REFERRAL

TO

#### OFFICE OF GENERAL COUNSEL

DATE: November 13, 1997

ANALYST: Neil Evans

I. COMMITTEE: Harris County Democratic Party (C00161067)

David Mincberg, Treasurer

811 Westheimer #103 Houston, TX 77006

II. RELEVANT 11 CFR §102.5(a)(1)(i)

STATUTES:

III. BACKGROUND:

Transfers-in from the Non-Federal Account for Non-Allocable Activity

The Harris County Democratic Party ("the Committee") received a \$1,280.06 transfer-in on September 3, 1996 and a \$48,171.25 transfer-in on October 1, 1996 from its non-federal account for non-federal activities disclosed on Schedule B of the Amended 1996 October Quarterly and Amended 1996 12 Day Pre-General Reports, respectively. The transfers-in were reported on Schedule H3, supporting Line 18 of the Detailed Summary Page. The non-federal activities were originally disclosed on Schedules H2 and H4 and were described as a 100% non-federal direct candidate support mailout, and as a 100% non-federal exempt expense, respectively. Furthermore, the non-federal disbursements correspond exactly to the transfers-in by amount and date (Attachment 2).

On May 7, 1997, a Request for Additional Information ("RFAI") regarding the Amended 1996 October Quarterly Report was sent to the Committee which advised it that the \$1,280.06 transfer-in from the non-federal account for non-allocable activity was impermissible. The RFAI recommended that the full amount of the transfer be returned to the non-federal account (Attachment 3).

HARRIS COUNTY DEMOCRATIC PARTY REPORTS ANALYSIS OGC REFERRAL PAGE 2

On May 7, 1997, an RFAI regarding the Amended 1996 12 Day Pre-General Report was sent to the Committee which advised it that there were transfers-in outside of the 70-day permissible time period. This RFAI was based on the \$48,171.25 transfer-in for the corresponding non-federal activity reported on Schedule B (Attachment 4).

On May 14, 1997, the analyst spoke with Jennie Duggan, the Finance Director of the Committee, about the transfers-in for non-allocable activity. The analyst stated that they should refund the money transferred-in for the non-allocable activity. He also mentioned that they may need to declare a debt to the non-federal account if they are unable to immediately transfer funds (Attachment 5).

On May 21, 1997, Jennie Duggan called to verify if they could transfer-in money from their non-federal account for allocation, then make transfers back to the non-federal account to pay off their debt. The analyst replied that they could (Attachment 5).

On May 29, 1997, Second Notices were sent to the Committee for the Amended October Quarterly and Amended 12 Day Pre-General Reports noting that the Commission received no written response from the Committee (Attachment 6).

On June 2, 1997, the Commission received a response from the Committee for the 1996 Amended October Quarterly and Amended 12 Day Pre-General Report RFAIs which included a Scheduled D listing a debt of \$50,068.27 to HCDP STATE PAC for excess transfers. The Committee also provided a copy of a check from the Committee to the HCDP STATE PAC for \$7,252.03 dated May 28, 1997 for debt payment. Regarding the Amended October Quarterly Report, the Committee stated that, "The \$1,208.06 transfer from the non-federal account has been incorporated into our debt on Schedule D." Regarding the Amended 12 Day Pre-General Report, the Committee stated that, "The Party has incorporated all 100% non-federal transactions (which were subsequently re-reported on a Schedule B) onto the above-mentioned debt schedule." The Committee calculated the debt by using the 70-day permissible time period, not by linking specific transfers-in with specific non-allocable disbursements (Attachment 7).

On June 30, 1997, the analyst called and left a message for the treasurer of the Committee. When Jennie Duggan returned the call, the analyst asked if any more transfers had been made to pay off debt to the non-federal account. Ms.

#### HARRIS COUNTY DEMOCRATIC PARTY REPORTS ANALYSIS OGC REFERRAL PAGE 3

Dugan replied that they had not made any more transfers, and were waiting until the end of the reporting period to make transfers; however, she stated that they would make another transfer the following day and send a copy of the transfer check, by overnight mail (Attachment 8).

On July 2, 1997, the Commission received a letter and a copy of a check for debt payment from the Committee to the HCDP STATE PAC dated July 1, 1997 for \$200.00. The letter stated that the Committee is short on federal funds and has been financially unable to make many transfers to pay off the debt for excessive transfers-in, but that the Committee will pay off the debt as soon as it is financially able (Attachment 9). The Committee's 1997 Mid-Year Report discloses an outstanding debt of \$42,816.24 still owed to HCDP STATE PAC (Attachment 10).

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FEDERAL ELECTION COMMISSION 1995-1996

DATE 12NOV97

<u>(3 pages</u>

COMMITTEE DOCUMENT RECEIPTS # OF DISBURSEMENTS MICROFILM COVERAGE DATES PAGES LOCATION

			TYPE	OF FILER
HARRIS COUNTY DEMOCRATIC PARTY			ID #CO0161067 PART	Y QUALIFIED
CONNECTED ORGANIZATION: TEXAS DEMOCRATIC PARTY				
1995 STATEMENT OF ORGANIZATION - AMENDMENT			12APR95	2 95FEC/9/1/5416
MID-YEAR REPORT	76,376	81,075	1JAN95 -30JUN95	58 95FEC/993/0619
HID-YEAR REPORT - AMENDMENT	80,141	89,418	1JAN95 -30JUN95	59 96FEC/019/1799
MID-YEAR REPORT - AMENDMENT	92,476	96,463	1JAN95 -30JUN95	62 96FEC/048/4584
REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -30JUN95	9 95FEC/009/5013
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN95 -30JUN95	10 95FEC/012/5428
REQUEST FOR ADDITIONAL INFORMATION			1JAN95 -30JUN95	3 96FEC/037/4937
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JAN95 -30JUN95	4 96FEC/047/4839
YEAR-END	47,425	49,149	1JUL95 -31DEC95	42 96FEC/028/4009
YEAR-END - AMENDMENT	48,122	49,521	1JUL95 -31DEC95	47 96FEC/048/4521
YEAR-END - AMENDMENT	48,122	49,521	1JUL95 -31DEC95	6 96FEC/065/0874
REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	8 96FEC/037/4940
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL95 -31DEC95	8 96FEC/047/4831
REQUEST FOR ADDITIONAL INFORMATION			1JUL95 -31DEC95	3 96 FC/059/2414
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1996 APRIL QUARTERLY	6,830	5,701	1JAN96 -31MAR96	18 96FEC/046/0463
APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	3 96FEC/065/0847
APRIL QUARTERLY - AMENDMENT	8,030	6,901	1JAN96 -31MAR96	7 96FEC/065/0904
APRIL QUARTERLY - AMENDMENT	-	-	1JAN96 -31MAR96	4 96FEC/078/2777
APRIL QUARTERLY - AMENDMENT	_	-	1JAN96 -30APR96	5 96FEC/091/3561
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REQUEST FOR ADDITIONAL INFORMATION			1JAN96 -31MAR96	5 96FEC/082/4623
JULY QUARTERLY	16,529	14,963	1APR96 -30JUN96	24 96FEC/065/0880
JULY QUARTERLY - AMENDMENT	14,779	13,213	1APR96 -30JUN96	29 96FEC/078/2748
JULY QUARTERLY - AMENDMENT	-	-	1APR96 -30JUN96	10 96FEC/092/0590
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OCTOBER QUARTERLY - AMENDMENT	35,957	38,484	1JUL96 -30SEP96	35 97FEC/186/1318
OCTOBER QUARTERLY - AMENDMENT	35,957	38,484	1JUL96 -30SEP96	8 97FEC/189/1593
OCTOBER QUARTERLY - AMENDMENT	-		1JUL96 -30SEP96	13 97FEC/206/2862
OCTOBER QUARTERLY - AMENDMENT	35,957	38,484	1JUL96 -30SCP96	24 97FEC/206/2875
REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -30SEP96	3 97FEC/181/0075
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL96 -30SEP96	2 97FEC/187/1527
REQUEST FOR ADDITIONAL INFORMATION			1JUL96 -30SEP96	6 97FEC/201/2107
REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL96 -30SEP96	6 97FEC/205/4776





TOTAL

#### FEDERAL ELECTION COMMISSION 1995-1996 TTEE INDEX OF DISCLOSURE DOCUMENTS - (C)

#### DATE 12NOV97 ATTACHMENT 1

886 TOTAL PAGES

COMMITTEE	DOCUMENT		RECEIPTS	DISBURSEMENTS		# OF MICROFILM PAGES LOCATION OF FILER
	PRE-GENERAL		77,681	71,261	10CT96 -160CT96	16 9(+cc/121/205
	PRE-GENERAL	- AMENDMENT	77,681	71,261	10CT96 -160CT96	19 97FEC/186/135
	PRE-GENERAL	- AMENDMENT	77,681	71,261	10CT96 -160CT96	10 97FEC/206/289
	PRE-GENERAL	- AMENDMENT	-	-	10CT96 -160CT96	1 97FEC/206/32
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	REQUEST FOR ADDITION				10CT96 -160CT96	3 97FEC/181/00
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		ONAL INFORMATION 2ND			10CT96 -160CT96	4 97FEC/205/47
		ONAL INFORMATION 2ND			10CT96 -160CT96	2 97FEC/208/16
	POST-GENERAL		99,257	100,005	170CT96 -20NOV96	31 96FEC/130/07
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	POST-GENERAL	- AMENDMENT	99,257	100,005	170CT96 -20NOV96	42 97FEC/186/13
	POST-GENERAL	<ul> <li>AMENDMENT</li> </ul>	99,257	100,005	170CT96 -20NOV96	11 97FEC/193/25
	POST-GENERAL	- AMENDMENT	99,257	100,005	170CT96 -20NOV96	23 97FEC/206/29
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	YEAR-END		16,542	19,389	21NOV96 -31DEC96	11 97FEC/166/26
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All reports have been reviewed. Ending cash-on-hand as of 12/31/96: \$3,305 Outstanding debts owed by the committee as of 12/31/96: \$8,700

392,844

395,237

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### FEDERAL ELECTION COMMISSION 1997-1998 COMPATTEE INDEX OF DISCLOSURE DOCUMENTS - (C)



#### DATE 12NOV97 ATTACHMENT 1 PAGE

COMMITTEE DOCUMENT	RECEIPTS	DISBURSEMENT	TS # OF MICROFILM COVERAGE DATES PAGES LOCATION TYPE OF FILER
HARRIS COUNTY DEMOCRATIC PARTY CONNECTED ORGANIZATION: TEXAS DEMOCRATIC PARTY 1997 APRIL QUARTERLY MID-YEAR REPORT REQUEST FOR ADDITIONAL INFORMATION REQUEST FOR ADDITIONAL INFORMATION	16,277 38,071	16,271 40,716	1D #COO161067 PARTY QUALIFIED  1JAN97 -31MAR97 22 97FEC/198/1222 1JAN97 -30JUN97 37 97FEC/221/2626 1JAN97 -30JUN97 6 97FEC/243/2883 1JAN97 -30JUN97 7 97FEC/248/1986
TOTAL	54,348	0 56,987	O 72 TOTAL PAGES

All reports have been reviewed. Ending cash-on-hand as of 6/30/97: \$974 Outstanding debts owed by the committee as of 6/30/97: \$49,016



ATTACHMENT (Page 2 of 8)

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#### SCHEDULE B

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#### **ITEMIZED DISBURSEMENTS**

Amended October Quarterly Report

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#### **ITEMIZED DISBURSEMENTS**

Amended 12 Day Pre-General Report

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Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee. NAME OF COMMITTEE (In Full) A. Full Name, Melling Address and Zif Code Purpose of Disturgement Date (month, Amount of Each day, year) CHIPMIAN STRATEGIES 515 POST DAK BIVOL Disburgement This Period PBA-EXEMPT 10/02/96 Primary General Disbursement for: Houston TX 77027 Other (specify) B. Full Kems, Mailing Address and ZiP Cods Purpose of Disburgement Date (month, Amount of Each day, year) Distursement This Period BA-EXEMPL 10/01/96 Distrumenters for: Primary Other (seedily) Purpose of Disburgament Date (month. Amount of Each C. Full Name, Melling Address and ZIP Code day, year) Disburgement This Period JAMSK3 10/08/96 Disbursement for: Primary Other (specify) D. Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each day, year) Disbursement This Period Disbursement for: Primary Other (specity) Data (month. Purpose of Disbursement Amount of Each B. Full Name, Mailing Address and ZIP Code day, year) Disburgement This Period Disbursement for: Primary Other (apecity) F, Full Name, Malling Address and ZIP Code Purpose of Disbursement Date (month, Amount of Each day, year) Disbursement This Period Genera Disbursement for: Primary Other (specify) Purpose of Distrussment Date (month, Amount of Each G. Full Name, Mailing Address and DP Code day, yesr) Disburgement This Period Primery General Disbursement for: Other (specify) M. Full Name, Mailing Address and ZiP Code Purpose of Diabursement Date (month, Amount of Each day, year) Discursement This Period Disbursement for: Primary General Other (specify) L Full Name, Mailing Address and ZIP Code Purpose of Disbursement Date (mosth, Amount of Each day, year) Disbursement This Period Disbursement for: Primary General Other (specify) SUBTOTAL of DisbursementsThis Page (optional) .......

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ATTACMENT 2 (Page 7 of 8)

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Original 12 Day Pre-General Report

NAME OF COMMITTEE

ALLOCATION RATIOS FOR INDIVIDUAL FUNDRAISING EVENTS, EXEMPT ACTIVITIES, AND SHARED DIRECT CANDIDATE SUPPORT APPEARING ON THIS REPORT.

Methods of allocation:

- FUNDRAISING activities are allocated using the "funds received method" where the federal proportion of expenses must equal the federal proportion of monies raised.
- II. EXEMPT activities are allocated using the "time and space method" where the federal proportion of disbursements is based on the proportion of time or space devoted to federal candidates.
- III. Shared DIRECT CANDIDATE support activities are allocated according to benefit expected to be derived, where the federal proportion of disbursements is based on the benefit derived by federal candidates from the activity.

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#### DISBURSEMENT SCHEDULE HA · (effective 1/1/91)

#### -30int-federal-mon-federal MACTIVITY SCHEDULE

Original 12 Day Pre-General Report

"DISBURSEMENT SCHEDULE 8-T FOR LINE 21a

NAME OF COMMITTEE Democratic Party County A. FULL NAME, MALLING ADDRESS & ZIP CODE PURPOSSEVENT TOTAL AMOUNT DATE PEDERAL SMARE **NON-FEDERAL** Politically Speaking SHARE udse. 10/16/95 47325 PO Box 35593 15759 52/15 2/5/06 HOUSTON TX 177235 CATEGORY: ADMINISTRATIVEVOTER DRIVE ☐ PLENDRAISING CI EXEMPT s 101454 87 EVENT YEAR-TO-DATE: CL DIRECT CANDIDATE SUPPORT B. FULL NAME, MAILING ADDRESS & ZIP CODE PUPPOSE/EVENT DATE TOTAL AMOUNT FEDERAL SHARE MON-FEDERAL Ada Edwards SWARE 62862 8010 Vickridue psyrall 10/15/95 Spring TX 77379 CATEGORY: CDADMINISTRATIVE/VOTER DRIVE [] FUNDRAISING O STEMPT EVENT YEAR TO DATE: \$ 102083.49 ILDIBECT CANCIDATE SUPPORT C. FULL NAME, MALING ADDRESS & ZIP CODE TOTAL AMOUNT **PURPOSE/EVENT** -DATE FEDERAL SHARE MONFEDERAL Charles P Young SHAPE 10/01/96 1616 MCGOWEN 48.171 25 HOUSTON, TX 77004 CATEGORY: ☐ ADMINISTRATIVE/VOTER DRIVE TI FUNDAMISINO KI EXCENSE! s 48171.75 EVENT YEAR-TO-DATE: U DIRECT CANDIQATE SUPPORT D. FULL NAME, MAILING ADDRESS & ZIP CODE NON-FEDERAL @ PURPOSE/EVENT TOTAL AMOUNT **FEDERAL SHARE** ACCESS TV SHARE 10/08/90 3900 MISM: 3919 HOUSTON ITX 77000 MEXEMPT C ADMINISTRATIVEVOTER DRIVE I FINOPALEING CATEGORY: EVENT YEAR-TO-DATE: DIRECT CANDIDATE SUPPORT FEDERAL SHARE NCOLFEDERAL E. FULL NAME, MARING ADDRESS & ZIP CODE PURPOSE/EVENT TOTAL AMOUNT DATE SIMI CATEGORY: □ FUNDRAISING **C ADMINISTRATIVE VOTER OFFIVE** CI EXEMPT □ DIRECT CANDIDATE SUPPORT EVENT YEAR-TO-DATE: MON-PEDERAL F. FULL NAME, MAILING ADDRESS & ZIP CODE **PURPOSE/EVENT** TOTAL AMOUNT FEDERAL SHAPE DATE SHARE CATEGORY: ADMINISTRATIVE/VOTER DRIVE D FUNDRAISING EVENT YEAR-TO-DATE: DIRECT CANDIDATE SUPPORT 49664 13 SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE TOTAL THIS PERIOD (lest page for each line only statement to 21 a i and non-Feet, share to 21 a ii) TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (weed for line 31 of the datalled summary name)



## FEDERAL ELECTION COMMISSION WASHINGTON, D.C. 20463

RQ-2

David Mincberg, Treasurer
Harris County Democratic Party
811 Westheimer, #103
Houston, TX 77006

MAY 7 1997

Identification Number: C00161067

Reference: Amended October Quarterly Report (7/1/96-9/30/96) dated 2/20/97

Dear Mr. Mincberg:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The totals listed on Lines 11(a)(i), 11(a)(iii), 11(d), 19, 20, 21(a)(i), 21(a)(ii), 26, 30 and 31, Column B of the Detailed Summary Page appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-Schedule H4 discloses a 100% non-federal allocation ratio for certain administrative/voter drive expenses. These disbursements that are 100% non-federal and are paid for by the federal account should be disclosed on the Schedule B for Line 21(b). Any transfer from the non-federal account for this disbursement must be returned to the non-federal account. Please amend your report to clarify this discrepancy.

-Schedule H3 discloses a \$1,280.06 transfer from the non-federal account for an activity that is not allocable between the federal and non-federal accounts. Please transfer-out the funds to the non-federal account. Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out. In addition, the





(Page 2 of 2)

transfer-out should be disclosed on Schedule B supporting Line 29 of your next report.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans

Reports Analyst

Reports Analysis Division

254

. 25-1-



#### FEDERAL ELECTION COMMISSION

RQ-2

WASHINGTON, D.C. 20463

David Mincberg, Treasurer Harris County Democratic Party 811 Westheimer #103 Houston, TX 77006 MAY 7 1997

Identification Number: C00161067

Reference: Amended 12 Day Pre-General Report (10/1/96-10/16/96) dated 2/20/97

Dear Mr. Mincberg:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): PBA-EXEMPT, JBA-EXEMPT, AND TVB-EXEMPT. For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule H3 of your report discloses transfers received from your non-federal account which occur outside the permissible transfer period. Please be advised that transfers for shared activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.5(g)(2) and 106.6(e)(2) Please clarify the nature of these transfers-in from the non-federal account.

The Commission recommends that you immediately transfer the total excessive amount received by your federal account outside the 70-day time period back to your non-federal account. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-Please amend your report by providing the full name and address for each disbursement itemized on Schedule B supporting Line 21(b).

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans

Reports Analyst

Reports Analysis Division

254

#### **TELECON**

ANALYSI:	Neil Evans
COMMITTEE:	Harris County Democratic Party (C00161067)
CONVERSATION WITH	Jennie Duggan

DATE	May 14, 1997
SUBJECT(S):	1. Transfers-In from Non-Federal Account
	2. Excessive Receipts in Combination with Affiliates

The Committee asked how they may resolve the issue of transfers-in for non-allocable activity. I stated that they should refund the money transferred-in for the non-allocable activity. I included that they may need to declare a debt to the non-federal account if they are unable to immediately transfer funds. The Committee asked if they could transfer-in money from their non-federal account for allocation. I replied that they could.

I also informed the Committee to expect letters, which were mailed today, regarding excessive receipts with affiliates. I offered my help to her if she has any questions regarding the letters.

DATE:	May 21, 1997	
SUBJECT(S):	Tailstois-in from Pon-Podeta / Roodsit	

The Committee asked if they could transfer-in money from their non-federal account for allocation, then make transfers back to the non-federal account to pay off their debt. I replied that they could.







## FEDERAL ELECTION COMMISSION RQ-3 WASHINGTON, D.C. 20463

May 29, 1997

David Mincberg, Treasurer Harris County Democratic Party 811 Westheimer, #103 Houston, TX 77006

Identification Number:

C00161067

Reference:

Amended October Quarterly (7/1/96-9/30/96 dated 2/20/97), Amended

12 Day Pre-General (10/1/96-10/16/96 dated 2/20/97) and Amended 30

Day Post-General (10/17/96-11/25/96 dated 2/20/97) Reports

Dear Mr. Mincberg:

This letter is to inform you that as of May 28, 1997, the Commission has not received your response to our requests for additional information dated May 7, 1997. These notices request information essential to full public disclosure of your federal election campaign finances. To ensure compliance with the provisions of the Federal Election Campaign Act (the Act), please respond to these requests (copies enclosed).

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions regarding this matter, please contact Neil Evans on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

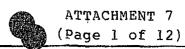
John D. Gibson

Assistant Staff Director Reports Analysis Division

Enclosures

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# HARRIS COUNTY DEMOCRATION PARTY TAKING BACK HARRIS COUNTY A TAKING BACK HARRIS COUNTY BACK

811 Westheimer, Suite 103 ° Houston, Texas 77006 ° Phone: 713/5229361 °ZEAX: 7/3/522-9622

Neil Evans, Reports Analyst Federal Election Commission Washington, D.C. 20463

May 28, 1997

Identification Number: C00161067

Reference: 1996 October Quarterly Report

1996 12-day Pre-General Report 1996 30 Day Post General Report

Dear Mr. Evans:

This tetter is in regards to your inquiries dated May 7, 1997. The Commission's concerns have been addressed as follows:

#### October Quarterly Report (07/01/96-09/30/96):

- Calculations on the Detailed Summary Page have been corrected
- Two 100% non-federal transactions in the amounts of \$369.05 and \$839.69 have been re-reported on a schedule B. Admin/Voter Drive totals have been recalculated to reflect this and he Party has also corrected the Detailed Summary Page.
- The Party recognizes that re-reporting the non-federal transactions on a Schedule B will show us as being over our transfer limit. Therefore, we have included a debt schedule that incorporates these transactions. A more detailed explanation of how we derived our federal debt can be found in the latter portion of this response.
- The \$1,208.06 transfer from the non-federal account has been incorporated into our debt on Schedule D.

#### 12-day Pre-General Report (10/01/96-10/16/96):

- "PBA-EXEMPT", "TVB-EXEMPT, and "JBA-EXEMPT" were so called because of their non-federal content, meaning that they should be "exempt" from the definition of a federal activity. We recognize that this has caused some confusion, and have re-named them "PBA", "TVB", and "JBA" on the enclosed report.
- The Party has incorporated all 100% non-federal transactions (which were subsequently re-reported on a Schedule B) onto the above-mentioned debt schedule.
- We have included addresses previously omitted on Schedule B.

#### 30-day Post-General Report (10/17/96):

• Calculations on the Detailed Summary have been corrected

- Clarified descriptions have been given for all Schedule B disbursements. "Remb. for expenses" refers to the Party's reimbursement of individuals who paid neighborhood block-walkers and printers to produce and distribute literature that has been classified as federal literature.
- The Party has incorporated all 100% non-federal transactions (which were subsequently re-reported on a Schedule B) onto the above-mentioned debt schedule.

Because our calendar year-to-date totals have changed, we have enclosed an amended copy of our year-end report (11/21-12/31).

#### Explanation-HCDP Federal PAC debt to non-federal account:

We have calculated our debt to the non-federal account to be \$50,068.27. The debt does not equal the entire amount of non-federal transactions subsequently classified as federal because of excess transfer capability remaining from our joint federal/non-federal allocations. We have enclosed a worksheet that shows exactly which payments are applied to each transfer. You will see that all of the payments are attached to transfers within the permitted 70-day range. On the worksheets, "sum" refers to the total amount of non-federal transactions applied to the corresponding transfer.

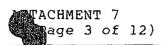
The Party has already made one deposit to our non-federal account in the amount of \$7,252.03. This is the amount that the party was entitled to transfer to cover payments made in the last 60 days. Because of the portion of individual contributions received by the party, we often cover disbursements with more federal money than is required by the FEC. This deposit lowers our current debt to \$42,816.24. The \$7,252.03 deposit, along with any subsequent deposits made on or before June 30, 1997, will be reflected on our July Quarterly report.

We hope that the Party has sufficiently addressed all of the Commission's concerns. If this is not the case, or if you have any further concerns, please feel free to contact Jennie Duggan at (713)522-9361. Thank you very much.

Sincerely,

Jennie Duggan, Finance Director Harris County Democratic Party





# HARRIS COUNTY DEMOCRATIC PARTY & TAKING BACK HARRIS COUNTY &

811 Westheimer, Suite 103 . Houston, Texas 77006 . Phone: 713/522-9361 . Fax: 713/522-9622

Mr. Evans:

The following debt schedule will be filed with our July Quarterly Report, unless you tell me differently. Also attached is a copy of the check for our first payment. Because the quarter is not over, I cannot yet fill out the portion asking for payments made this quarter. However, it will be at least \$7,252.03.

Please call me at (713)522-9361 if you have any further questions.

Jennie Duggan

SCHEDULE D (Revised 3/80) ATTACHMENT 7

DEBTS AND CBLIGATIONS (Page Excluding Loans

Page cl for UNE NUMBER (Use separate achedules for each numbered line)

Name of Committee (in Full) HArris County Democratic Party	Outstanding Belance Beginning This Period	Amount incurred This Period	Payment This Pariod	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and 21P Code of Dathor or Creditor HCDP State PAC 811 WESTNEUMER Ste. 103 HOUSTON TX T7006	50,068 <sup>27</sup>	Ø		
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Nature of Debt (Purpose):				
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Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTALS This Period (last page in this line only)				
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4) ADD 2) and 3) and carry forward to appropriate line of Summa	ry Page (last page on)	y)		





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#### Sheet1



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7/1/96		325.40	\$	108.36	\$	217.04				
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### ATTACK INT 7 (Page Ppf 12)

#### Sheet1

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į	9/3/96 \$	4,265	49	\$	1,420.41	\$	2,845.08				
	9/3/96 \$			\$	1,280.06	\$	2,0 0.00				
	9/4/96 \$	•	.16	\$	19.70	Š	39.46				
	0/6/96 ¢			Ψ E	72.04	¢.	144.30				

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TACHMENT 7

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	9/10/96	\$	140.00	\$ 46.62	\$ 93.38			
	9/10/96	\$	25.26	\$ 8.41	\$ 16.85			
	9/12/96	\$	300.00	\$ 99.90	\$ 200.10			
	9/13/96	\$	32.00	\$ 10.66	\$ 21.34			
	9/16/96	\$	612.62	\$ 204.00	\$ 408.62			
l	9/16/96	\$	596.62	\$ 198.67	\$ 397.95			
	9/16/96	\$	692.62	\$ 230.64	\$ 461.98			
	9/16/96	\$	72.50	\$ 24.14	\$ 48.36			
	9/16/96	\$	312.31	\$ 104.00	\$ 208.31			
	9/16/96	\$	17.31	\$ 11.53	\$ 5.78			
	9/19/96	\$	86.00	\$ 28.64	\$ 57.36			
	9/25/98	\$	88.90	\$ 29.60	\$ 59.30			
	9/25/96	\$	200.00	\$ 66.60	\$ 133.40			
	9/27/96	\$	51.80	\$ 17.25	\$ 34.55			
	9/30/96	\$	4,581.14	\$ 3,055.62	\$ 1,525.52			
	9/30/96	\$	612.62	\$ 204.00	\$ 408.62			
	9/30/96	\$	692.62	\$ 230.64	\$ 461.98			
	9/30/96	\$	596.62	\$ 198.67	\$ 397.95			ONE \$ 30,386 52
	9/30/96	\$	223.90	\$ 74.56	\$ 149.34			ONG 2010-211
	9/30/96	\$	628.62	\$ 209.33	\$ 419.29			
	9/30/96	\$	312.31	\$ 104.00	\$ 208.31			
	10/1/96						48171.25	
	10/1/96	\$	48,171.25	\$ 48,171.25				
	10/2/96	\$	5,590.00	\$ 5,590.00				
	10/7/96	\$	37.10	\$ 12.35	\$ 24.75			
	10/8/96	•	341.01	\$ 113.56	\$ 227.45			
	10/8/96	\$	27.00	\$ 8.99	\$ 18.01			
	10/8/96	\$	71.35	\$ 23.76	\$ 47.59			
	10/8/96	\$	391.01	\$ 391.01				
	10/10/96	\$	600.33	\$ 199.91	\$ 400.42			
	10/4/96	\$	250.00	\$ 83.25	\$ 166.75			
	10/4/96	\$	3,700.00	\$ 1,232.10	\$ 2,467.90			
	10/8/96	\$	5,155.90	\$ 1,716.91	\$ 3,438.99	\$ 17,784.73		
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10/2/96 5600	<b>DYSC</b>	\$5600-
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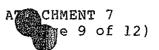
10/15/96 10/15/96 10/15/96 10/15/96 10/15/96 10/15/96	\$ \$ \$ \$ \$	196.94 1,000.00 1,254.07 221.92 88.62 69.00 692.62	\$ \$ \$ \$	65.58 333.00 417.61 73.90 29.51 22.98 230.64	55555	131.36 667.00 836.46 148.02 59.11 46.02 461.98	\$.	2,769.24		UNDER \$ 301.39
10/5/96						,01100		_,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	2467.9	

10/8/96	3000	ONER & 10000-
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10/15/96 \$ 628.62 \$ 209.33 \$ 419.29



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l	10/16/96	\$	1,538.50	\$ 512.32	\$	1,026.18	•				
	10/16/96	\$	473.25	\$ 157.59	\$	315.66					
	10/18/98	\$	1,136.62	\$ 1,136.62							
	10/18/96	\$	15,000.00	\$ 15,000.00							
	10/18/96	\$	4,465.31	\$ 4,465.31							
	10/18/96		•	-					15,000		
	10/18/96	\$	416.00	\$ 138.65	\$	277.35					
	10/18/96	\$	130.26	\$ 43.42	\$	86.84					
	10/18/96	\$	7,500.00	\$ 2,499.75	\$	5,000.25					
	10/18/96	\$	687.91	\$ 229.28	\$	458.63				3 3713 c	NEC.
	10/18/96	\$	106.39	\$ 35.46	\$	70.93					
	10/18/96	\$	211.63	\$ 70.54	\$	141.09					
	10/18/96	\$	92.50	\$ 30.83	\$	61.67					
	10/18/98	\$	94.68	\$ 31.56	\$	63.12					
	10/18/96	\$	17.75	\$ 5.92	\$	11.83				i	
	10/18/96	\$	6.00	\$ 2.00	\$	4.00					
	10/21/96	\$	5,000.00	\$ 1,666.50	\$	3,333.50					
	10/20/96	\$	9.20	\$ 3.07	\$	6.13					
	10/20/98	\$	15.80	\$ 5.27	\$	10.53					
	10/21/96	\$	1,434.31	\$ 1,434.31							
	10/21/96	\$	170,00	\$ 170.00							
	10/21/96	\$	3,863.38	\$ 3,863.38			\$	11,287.00			
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0/21/96	\$	480.00	\$	159.98	\$	320.02		
0/21/96	\$	73.88	\$	24.62	\$	49.26		
0/21/96	\$	329.61	\$	109.86	\$	219.75		
0/22/96	\$	5,000.00	\$	5,000.00				
0/22/96	\$	3,000.00	\$	3,000.00				
0/22/98	\$	320.00	\$	106.66	\$	213.34		
0/22/96	\$	37.45	\$	12.48	\$	24.97		
0/22/96	\$	676.50	\$	225.48	\$	451.02		
0/23/96	\$	269.00	\$	269.00				
0/23/96	\$	347.14	\$	115.70	\$	231.44		
0/23/96	\$	52.60	\$	17.53	\$	35,07		
0/24/96	\$	5,000.00	\$	5,000.00				0/045/0 00
0/24/98	\$	1,050.00	\$	1,050.00				Over \$568.04
0/24/96	\$	1,400.00	\$	1,400.00				
0/24/96	\$	1,050.00	\$	1,050.00				
0/24/96	\$	192.00	\$	64.00	\$	128.00		
0/24/96	\$	320.00	\$	106.66	\$	213.34		
0/25/96	\$	300.00	\$	300.00				
0/25/96	\$	3,600.00	\$	3,600.00				
0/25/96	\$	1,300.26	\$	433.38	\$	866.88		
0/25/96	\$	25.00	\$	8.33	\$	16.67		
0/28/96	\$	1,400.00	\$	1,400.00				
0/28/96	\$	1,000.00	\$	1,000.00				
0/28/96	\$	100.00	\$	100.00				
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	0/21/96 0/21/96 0/22/96 0/22/96 0/22/96 0/23/96 0/23/96 0/23/96 0/23/96 0/24/96 0/24/96 0/24/96 0/25/96 0/25/96 0/25/96 0/25/96 0/25/96 0/25/96 0/25/96 0/28/96	0/21/96       \$         0/21/96       \$         0/22/96       \$         0/22/96       \$         0/22/96       \$         0/22/96       \$         0/22/96       \$         0/22/96       \$         0/23/96       \$         0/23/96       \$         0/23/96       \$         0/24/96       \$         0/24/96       \$         0/24/96       \$         0/24/96       \$         0/25/96       \$         0/25/96       \$         0/25/96       \$         0/25/96       \$         0/25/96       \$         0/25/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96       \$         0/28/96 </td <td>0/21/96       \$ 480.00         0/21/96       \$ 73.88         0/21/96       \$ 329.61         0/22/96       \$ 5,000.00         0/22/96       \$ 3,000.00         0/22/96       \$ 320.00         0/22/96       \$ 37.45         0/22/96       \$ 676.50         0/23/96       \$ 269.00         0/23/96       \$ 5,000.00         0/24/96       \$ 1,050.00         0/24/96       \$ 1,050.00         0/24/96       \$ 1,050.00         0/24/96       \$ 320.00         0/24/96       \$ 320.00         0/24/96       \$ 300.00         0/25/96       \$ 3,600.00         0/25/96       \$ 3,600.00         0/25/96       \$ 1,300.26         0/25/96       \$ 1,000.00         0/28/96       \$ 1,000.00         0/28/96       \$ 1,000.00         0/28/96       \$ 2,776.84</td> <td>0/21/96       \$       480.00       \$         0/21/96       \$       73.88       \$         0/22/96       \$       329.61       \$         0/22/96       \$       5,000.00       \$         0/22/96       \$       3,000.00       \$         0/22/96       \$       320.00       \$         0/22/96       \$       37.45       \$         0/22/96       \$       676.50       \$         0/23/96       \$       269.00       \$         0/23/96       \$       347.14       \$         0/23/96       \$       5,000.00       \$         0/24/96       \$       1,050.00       \$         0/24/96       \$       1,050.00       \$         0/24/96       \$       1,050.00       \$         0/24/96       \$       320.00       \$         0/24/96       \$       3,600.00       \$         0/25/96       \$       1,300.26       \$         0/25/96       \$       1,400.00       \$         0/25/96       \$       1,000.00       \$         0/28/96       \$       1,000.00       \$         0/28/96       \$</td> <td>0/21/96       \$       480.00       \$       159.98         0/21/96       \$       73.88       \$       24.62         0/21/96       \$       329.61       \$       109.86         0/22/96       \$       5,000.00       \$       3,000.00         0/22/96       \$       3,000.00       \$       3,000.00         0/22/96       \$       320.00       \$       106.66         0/22/96       \$       37.45       \$       12.48         0/22/96       \$       676.50       \$       225.48         0/23/96       \$       269.00       \$       269.00         0/23/96       \$       347.14       \$       115.70         0/23/96       \$       5,000.00       \$       5,000.00         0/24/96       \$       1,050.00       \$       1,050.00         0/24/96       \$       1,050.00       \$       1,050.00         0/24/96       \$       1,050.00       \$       1,050.00         0/24/96       \$       320.00       \$       300.00         0/25/96       \$       3,600.00       \$       3,600.00         0/25/96       \$       1,300.26       \$</td> <td>0/21/96       \$ 480.00       \$ 159.98         0/21/96       \$ 73.88       \$ 24.62         0/21/96       \$ 329.61       \$ 109.86         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66         0/22/96       \$ 37.45       \$ 12.48         0/22/96       \$ 676.50       \$ 225.48         0/23/96       \$ 269.00       \$ 269.00         0/23/96       \$ 347.14       \$ 115.70         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/25/96       \$ 300.00       \$ 3600.00         0/25/96       \$ 1,300.26       \$ 433.38         0/25/96       \$ 1,000.00       \$ 1,400.00         0/28/96       \$ 1,000.00       \$ 1,000.00         0/28/96       \$ 2,776.84       \$ 2,776.84    <td>0/21/96       \$ 480.00       \$ 159.98       \$ 320.02         0/21/96       \$ 73.88       \$ 24.62       \$ 49.26         0/21/96       \$ 329.61       \$ 109.86       \$ 219.75         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66       \$ 213.34         0/22/96       \$ 676.50       \$ 225.48       \$ 24.97         0/23/96       \$ 269.00       \$ 269.00       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 320.00       \$ 106.66       \$ 213.34         0/25/96       \$ 3600.00       \$ 3600.00       \$ 213.34         0/25/96       \$ 1,300.26       \$ 433.38       \$ 866.88         0/25/96       \$ 1,000.00       \$ 1,000.00         0/28/96<!--</td--><td>0/21/96       \$ 480.00       \$ 159.98       \$ 320.02         0/21/96       \$ 73.88       \$ 24.62       \$ 49.26         0/21/96       \$ 329.61       \$ 109.86       \$ 219.75         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66       \$ 213.34         0/22/96       \$ 37.45       \$ 12.48       \$ 24.97         0/22/96       \$ 676.50       \$ 225.48       \$ 451.02         0/22/96       \$ 269.00       \$ 269.00         0/23/96       \$ 269.00       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 106.66       \$ 213.34         0/24/96       \$ 1,050.00       \$ 106.66       \$ 213.34         0/25/96       \$ 30.00       \$ 3600.00       \$ 128.00         0/25/96       \$ 3,600.00       \$ 3,600.00       \$ 13.34         0/25/96       \$ 1,300.26       \$ 433.38       866.88</td></td></td>	0/21/96       \$ 480.00         0/21/96       \$ 73.88         0/21/96       \$ 329.61         0/22/96       \$ 5,000.00         0/22/96       \$ 3,000.00         0/22/96       \$ 320.00         0/22/96       \$ 37.45         0/22/96       \$ 676.50         0/23/96       \$ 269.00         0/23/96       \$ 5,000.00         0/24/96       \$ 1,050.00         0/24/96       \$ 1,050.00         0/24/96       \$ 1,050.00         0/24/96       \$ 320.00         0/24/96       \$ 320.00         0/24/96       \$ 300.00         0/25/96       \$ 3,600.00         0/25/96       \$ 3,600.00         0/25/96       \$ 1,300.26         0/25/96       \$ 1,000.00         0/28/96       \$ 1,000.00         0/28/96       \$ 1,000.00         0/28/96       \$ 2,776.84	0/21/96       \$       480.00       \$         0/21/96       \$       73.88       \$         0/22/96       \$       329.61       \$         0/22/96       \$       5,000.00       \$         0/22/96       \$       3,000.00       \$         0/22/96       \$       320.00       \$         0/22/96       \$       37.45       \$         0/22/96       \$       676.50       \$         0/23/96       \$       269.00       \$         0/23/96       \$       347.14       \$         0/23/96       \$       5,000.00       \$         0/24/96       \$       1,050.00       \$         0/24/96       \$       1,050.00       \$         0/24/96       \$       1,050.00       \$         0/24/96       \$       320.00       \$         0/24/96       \$       3,600.00       \$         0/25/96       \$       1,300.26       \$         0/25/96       \$       1,400.00       \$         0/25/96       \$       1,000.00       \$         0/28/96       \$       1,000.00       \$         0/28/96       \$	0/21/96       \$       480.00       \$       159.98         0/21/96       \$       73.88       \$       24.62         0/21/96       \$       329.61       \$       109.86         0/22/96       \$       5,000.00       \$       3,000.00         0/22/96       \$       3,000.00       \$       3,000.00         0/22/96       \$       320.00       \$       106.66         0/22/96       \$       37.45       \$       12.48         0/22/96       \$       676.50       \$       225.48         0/23/96       \$       269.00       \$       269.00         0/23/96       \$       347.14       \$       115.70         0/23/96       \$       5,000.00       \$       5,000.00         0/24/96       \$       1,050.00       \$       1,050.00         0/24/96       \$       1,050.00       \$       1,050.00         0/24/96       \$       1,050.00       \$       1,050.00         0/24/96       \$       320.00       \$       300.00         0/25/96       \$       3,600.00       \$       3,600.00         0/25/96       \$       1,300.26       \$	0/21/96       \$ 480.00       \$ 159.98         0/21/96       \$ 73.88       \$ 24.62         0/21/96       \$ 329.61       \$ 109.86         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66         0/22/96       \$ 37.45       \$ 12.48         0/22/96       \$ 676.50       \$ 225.48         0/23/96       \$ 269.00       \$ 269.00         0/23/96       \$ 347.14       \$ 115.70         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/25/96       \$ 300.00       \$ 3600.00         0/25/96       \$ 1,300.26       \$ 433.38         0/25/96       \$ 1,000.00       \$ 1,400.00         0/28/96       \$ 1,000.00       \$ 1,000.00         0/28/96       \$ 2,776.84       \$ 2,776.84 <td>0/21/96       \$ 480.00       \$ 159.98       \$ 320.02         0/21/96       \$ 73.88       \$ 24.62       \$ 49.26         0/21/96       \$ 329.61       \$ 109.86       \$ 219.75         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66       \$ 213.34         0/22/96       \$ 676.50       \$ 225.48       \$ 24.97         0/23/96       \$ 269.00       \$ 269.00       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 320.00       \$ 106.66       \$ 213.34         0/25/96       \$ 3600.00       \$ 3600.00       \$ 213.34         0/25/96       \$ 1,300.26       \$ 433.38       \$ 866.88         0/25/96       \$ 1,000.00       \$ 1,000.00         0/28/96<!--</td--><td>0/21/96       \$ 480.00       \$ 159.98       \$ 320.02         0/21/96       \$ 73.88       \$ 24.62       \$ 49.26         0/21/96       \$ 329.61       \$ 109.86       \$ 219.75         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66       \$ 213.34         0/22/96       \$ 37.45       \$ 12.48       \$ 24.97         0/22/96       \$ 676.50       \$ 225.48       \$ 451.02         0/22/96       \$ 269.00       \$ 269.00         0/23/96       \$ 269.00       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 106.66       \$ 213.34         0/24/96       \$ 1,050.00       \$ 106.66       \$ 213.34         0/25/96       \$ 30.00       \$ 3600.00       \$ 128.00         0/25/96       \$ 3,600.00       \$ 3,600.00       \$ 13.34         0/25/96       \$ 1,300.26       \$ 433.38       866.88</td></td>	0/21/96       \$ 480.00       \$ 159.98       \$ 320.02         0/21/96       \$ 73.88       \$ 24.62       \$ 49.26         0/21/96       \$ 329.61       \$ 109.86       \$ 219.75         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66       \$ 213.34         0/22/96       \$ 676.50       \$ 225.48       \$ 24.97         0/23/96       \$ 269.00       \$ 269.00       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 320.00       \$ 106.66       \$ 213.34         0/25/96       \$ 3600.00       \$ 3600.00       \$ 213.34         0/25/96       \$ 1,300.26       \$ 433.38       \$ 866.88         0/25/96       \$ 1,000.00       \$ 1,000.00         0/28/96 </td <td>0/21/96       \$ 480.00       \$ 159.98       \$ 320.02         0/21/96       \$ 73.88       \$ 24.62       \$ 49.26         0/21/96       \$ 329.61       \$ 109.86       \$ 219.75         0/22/96       \$ 5,000.00       \$ 5,000.00         0/22/96       \$ 3,000.00       \$ 3,000.00         0/22/96       \$ 320.00       \$ 106.66       \$ 213.34         0/22/96       \$ 37.45       \$ 12.48       \$ 24.97         0/22/96       \$ 676.50       \$ 225.48       \$ 451.02         0/22/96       \$ 269.00       \$ 269.00         0/23/96       \$ 269.00 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\$ 676.50       \$ 225.48       \$ 451.02         0/22/96       \$ 269.00       \$ 269.00         0/23/96       \$ 269.00       \$ 231.44         0/23/96       \$ 347.14       \$ 115.70       \$ 231.44         0/23/96       \$ 5,000.00       \$ 5,000.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 1,050.00         0/24/96       \$ 1,050.00       \$ 106.66       \$ 213.34         0/24/96       \$ 1,050.00       \$ 106.66       \$ 213.34         0/25/96       \$ 30.00       \$ 3600.00       \$ 128.00         0/25/96       \$ 3,600.00       \$ 3,600.00       \$ 13.34         0/25/96       \$ 1,300.26       \$ 433.38       866.88



# ATT CHMENT 7 pe 10 of 12)

#### Sheet1

10/28/96	\$ 628.62	\$ 209.52	\$ 419.10	٠	
10/28/96	\$ 692.62	\$ 230.85	\$ 461.77		
10/28/96	\$ 46.25	\$ 15.42	\$ 30.83		
10/28/96	\$ 744.58	\$ 248.16	\$ 496.40		
10/28/96	\$ 1,500.00	\$ 330.00	\$ 1,170.00		
10/30/96	\$ 385.00	\$ 385.00			
10/30/96	\$ 110.00	\$ 36.66	\$ 73.34		
10/30/96	\$ 150.00	\$ 33.00	\$ 117.00		
10/31/96	\$ 92.50	\$ 30.83	\$ 61.67		
10/31/96	\$ 28.40	\$ 9.47	\$ 18.93		
10/31/96	\$ 49.00	\$ 16.33	\$ 32.67	\$	4,431.96

10/25/96	4900	ONER \$ 4000 -
10,50,00	TOVAL	

10/31/96	\$ 5,000.00	\$ 1,666.50	\$ 3,333.50			
11/1/96	\$ 2,194.50	\$ 2,194.50				
11/1/96	\$ 700.00	\$ 700.00				
11/1/98	\$ 64.92	\$ 21.64	\$ 43.28			
11/1/98	\$ 2,337.13	\$ 778.97	\$ 1,558.16			
11/1/98	\$ 262.90	\$ 87.62	\$ 175.28			
11/1/96	\$ 373.22	\$ 124.39	\$ 248.83	•		
11/3/96	\$ 3,159.81	\$ 3,159.81				
11/4/96	\$ 280.00	\$ 280.00				
11/4/96	\$ 100.00	\$ 33.33	\$ 66.67			
11/4/96	\$ 500.00	\$ 166.65	\$ 333.35			
11/4/96	\$ 165.95	\$ 55.31	\$ 110.64			
11/5/96						7000
11/5/96	\$ 850.00	\$ 283.30	\$ 566.70			
11/5/96	\$ 207.84	\$ 69.27	\$ 138.57			
11/6/96	\$ 628.62	\$ 209.52	\$ 419.10	\$	6,994.08	

ONE \$5.92

	100.01	\$ 49.99	\$ 150.00	\$ 11/4/96
	1,866.67	\$ 933.20	\$ 2,799.87	\$ 11/5/96
	461.77	\$ 230.85	\$ 692.62	\$ 11/6/96
	195.69	\$ 97.83	\$ 293.52	\$ 11/8/96
	338.15	\$ 169.05	\$ 507.20	\$ 11/8/96
	166.68	\$ 83.32	\$ 250.00	\$ 11/8/96
	518.15	\$ 259.03	\$ 777.18	\$ 11/8/96
	131.37	\$ 65.67	\$ 197.04	\$ 11/8/96
1	18.04	\$ 9.02	\$ 27.06	\$ 11/15/98
	87.40	\$ 43.69	\$ 131.09	\$ 11/15/98
	37.34	\$ 18.66	\$ 56.00	\$ 11/15/96
5000				11/18/96
	37.34	\$ 18.66	\$ 56.00	\$ 11/19/96
	23.40	\$ 11.70	\$ 35.10	\$ 11/19/96
	397.77	\$ 198.85	\$ 596.62	\$ 11/19/96
	144.38	\$ 72.18	\$ 216.56	\$ 11/19/98
	24.73	\$ 12.37	\$ 37.10	\$ 11/19/96
	101.04	\$ 50.51	\$ 151.55	\$ 11/19/96

OVET \$ 29 (b)



TTACHMENT 7

Sheet1

COMMANDE DE LA COMMANDA DEL COMMANDA DE LA COMMANDA DEL COMMANDA DE LA COMMANDA DEL COMMANDA DE LA COMMANDA DEL COMMANDA DE LA COMMANDA DEL COMANDA DEL COMMANDA DEL COMMANDA DEL COMMANDA DEL COMMANDA DEL COMANDA DEL COMMANDA DEL C	11/19/96 11/26/96		320.67 160.00	\$ \$	106.88 53.33	\$	213.79 106.67		4,970.39	ł
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	12/2/96	\$	500.00	\$	166.65	\$	333.35			
	12/2/96		596.62	\$	198.85	\$	397.77			
	12/2/96	\$	210.75	\$	70.24	\$	140.51			
	12/2/96	-	143.87	\$	47.95	\$	95.92			
	12/2/96	\$	207.16	\$	69.05	\$	138.11			
	12/2/96	\$	23.38	\$	7.79	\$	15.59			
	12/2/96	\$	23.53	\$	7.84	\$	15.69			
	12/2/96	\$	22.40	\$	7.47	\$	14.93			
	12/9/96	\$	5,000.00	\$	1,667.00	\$	3,333.00			
	12/9/96	\$	5,000.00	\$	1,567.00	\$	3,333.00			
	12/16/96	\$	37.89	\$	12.63	\$	25.26			
	12/16/96	\$	878.94	\$	292.95	\$	585.99			
	12/16/98	\$	320.67	\$	106.88	\$	213.79			
	12/16/96	\$	94.18	\$	31.39	\$	62.79			
	12/16/96	\$	596.62	\$	198.85	\$	397.77			
	12/16/96	\$	210.76	\$	70.25	\$	140.51		`	
	12/17/96	\$	5,000.00	\$	1,666.50	\$	3,333.50		ì	
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	12/19/96	\$	28.23	\$	9.41	\$	18.82		1	BICHAIT YNA
	1/1/97	\$	18.00	\$	1.98	\$	16.02		}	· ·
	1/1/97	\$	204.30	\$	22.47	\$	181.83		/	
	1/6/97	\$	252.00	\$	27.72	\$	224.28		•	
	1/6/97	\$	596.62	\$	65.63	\$	530.99			
	1/6/97		38.81	\$	4.27	\$	34.54			
	1/6/97	\$	75.00	\$	8.25	\$	66.75			
	1/6/97	\$	75.00	\$	8.25	\$	66.75			
	1/6/97	-	210.76	\$	23.18	\$	187.58			
	1/6/97		5.00	\$	0.55	\$	4.45			
	1/8/97		109.61	\$	12.06	\$	97.55			
	1/8/97		15.05	\$	1.66	\$	13.39			
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	1/15/97		92.12	\$	10.13	\$ \$	81.99			
	1/15/97		226.02	\$	24.86	\$	201.16			
	1/28/97	-	75.00	\$	8.25	\$	66.75			
	1/28/97		201.38	\$	22.15	\$	179.23			
	1/28/97		7.06	\$	0.78	\$	6.28			
	1/28/97		50.00	\$	5.50	\$	44.50			
	1/30/97		15.05	\$	1.66	\$	13.39			
	1/30/97		596.62	\$	65.63	\$	530.99			
	1/30/97		134.37	\$	14.78	\$	119.59			
	1/30/97		210.00	\$	23.10	\$	186.90			
	2/6/97		526.12	\$	57.87		468.25	\$	16,869.48	
*****				-		<u> </u>		•		
	1/30/96									5000



### TACHMENT 7 ne 12 of 12)

Sheet1

1				213.62	\$ 26.40	\$ 240.02	\$ 1/30/97	
				267.00	\$ 33.00	\$ 300.00	\$ 2/6/97	İ
				0.89	\$ 0.11	\$ 1.00	\$ 2/6/97	
				40.84	\$ 5.05	\$ 45.89	\$ 2/6/97	
				122.84	\$ 15.18	\$ 138.02	\$ 2/6/97	
				38.52	\$ 4.76	\$ 43.28	\$ 2/6/97	
				22.25	\$ 2.75	\$ 25.00	\$ 2/7/97	
			•	30.63	\$ 3.79	\$ 34.42	\$ 2/10/97	
				530.99	\$ 65.63	\$ 596.62	\$ 2/15/97	
				119.59	\$ 14.78	\$ 134.37	\$ 2/15/97	
,				213.62	\$ 26.40	\$ 240.02	\$ 2/15/97	
				35.43	\$ 4.38	\$ 39.81	\$ 2/19/97	
				234.76	\$ 29.01	\$ 263.77	\$ 2/19/97	
				4.45	\$ 0.55	\$ 5.00	\$ 2/24/97	
(0311 214				113.92	\$ 14.08	\$ 128.00	\$ 2/24/97	
OVEC 316.26				52.89	\$ 6.54	\$ 59.43	\$ 2/24/97	
				229.62	\$ 28.38	\$ 258.00	\$ 2/24/97	
	i			1,335.00	\$ 165.00	\$ 1,500.00	\$ 2/27/97	
				4.45	\$ 0.55	\$ 5.00	\$ 2/28/96	
				530.99	\$ 65.6 <b>3</b>	\$ 596.62	\$ 3/4/96	
				530.99	\$ 65.63	\$ 596.62	\$ 3/13/98	
				102.74	\$ 12.70	\$ 115.44	\$ 3/4/97	
		4,983.74	\$	207.71	\$ 25.67	\$ 233.38	\$ 3/4/97	

2/24/97	\$ 200.00	\$ 22.00	\$ 178.00			
3/8/97	\$ 466.75	\$ 51.34	\$ 415.41			
3/13/97	\$ 40.00	\$ 4.40	\$ 35.60			
3/13/97	\$ 129.99	\$ 14.30	\$ 115.69			
3/13/97	\$ 239.28	\$ 26.32	\$ 212.96	•		
3/13/97	\$ 40.00	\$ 4.40	\$ 35.60			
3/13/97	\$ 338.59	\$ 37.24	\$ 301.35			
3/13/97	\$ 137.43	\$ 15.12	\$ 122.31			
3/19/97	\$ 246.00	\$ 27.06	\$ 218.94			:
3/19/97	\$ 467.48	\$ 51.42	\$ 416.06			
3/19/97	\$ 378.60	\$ 41.65	\$ 336.95			
3/19/97	\$ 208.16	\$ 22.90	\$ 185.26			
3/19/97						5000
3/26/97	\$ 800.00	\$ 88.00	\$ 712.00			
3/26/97	\$ 228.00	\$ 25.08	\$ 202.92			
3/26/97	\$ 30.75	\$ 3.38	\$ 27.37			
3/26/97	\$ 36.76	\$ 4.04	\$ 32.72			
3/26/97	\$ 596.62	\$ 65.63	\$ 530.99			
3/26/97	\$ 207.10	\$ 22.78	\$ 184.32			
3/26/97	\$ 269.56	\$ 29.65	\$ 239.91			
3/26/97	\$ 490.00	\$ 53.90	\$ 436.10			
3/26/97	\$ 48.39	\$ 5.32	\$ 43.07	\$	4,983.53	

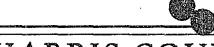
OVER \$ 10.47

DATE:	June 30, 1997
SUBJECT(S):	
<u> </u>	

The Committee returned my call made to the Committee earlier in the day. I asked the Committee if any more transfers had been made to pay off debt to the non-federal account. The Committee replied that they had not made any more transfers, and were waiting until the end of the reporting period; however, they stated that they will make another transfer tomorrow and overnight a copy of the transfer check.

The Committee volunteered that the overnight package would include a statement about the excessive receipts with affiliates.

14



# HARRIS COUNTY DEMOCRATIC PARTY & TAKING BACK HARRIS COUNTY &

811 WESTHEIMER, SUITE 103 . HOUSTON, TEXAS 77006 . PHONE: 713/522-9361 . FAX: 713/522-9622

Neil Evans
Reports Analyst
Federal Election Commission
Washington, D.C. 20003

June 30, 1997

Identification Number: C00161067

Reference: HCDP Federal Debt to Non-Federal Account

Dear Mr. Evans:

RECEIVED RECEIVED AND STATE OF THE PROPERTY OF

This letter is in regards to our telephone conversation yesterday regarding the Harris County Democratic Party's debt from our Federal account to our Non-Federal account. I want to thank you for contacting me to let me know that you had referred our case to the General Counsel's Office.

Regarding the debt, the Party made a \$7,252.03 transfer immediately after setting up the debt. At the time, we had excess Federal money in our account and put all of these funds toward the debt. Since this time, however, we have been short on Federal funds. As our next FEC report will show, we have only \$474.94 in our Federal account, with several outstanding bills. As a result, we had not, until today, made another repayment transfer. On your advice, we have made a small transfer this afternoon to show that we still fully intend to pay off this debt as quickly as possible.

When we originally set up the debt, you instructed the Party to continue to operate normally, allocating operating expenditures as we always have. This is what we have been doing, and this is why we are paying off the debt more slowly than the FEC might prefer. However, as stated above, the Party has the best of intentions and will pay off this debt as soon as it is financially possible.

Thank you again for contacting me. If you have any other questions, please feel free to telephone me again at (713)522-9361.

Sincerely,

Jennie Duggan, Finance Director Harris County Democratic Party ñI



ATTACHMENT 9 (Page 2 of 3)

# HARRIS COUNTY DEMOCRATIC PARTY & TAKING BACK HARRIS COUNTY &

811 Westheimer, Suite 103 . Houston, Texas 77006 . Phone: 713/522-9361 . Fax: 713/522-9622

Neil Evans Reports Analyst Federal Election Commission Washington, D.C. 20463

June 30, 1997

Identification Number: C-00161067

Reference: 1996 12 Day Pre-General Report

Dear Mr. Evans:

This letter is in regards to your inquiry regarding the activities PBA, JBA, and TVB. A more detailed description of their content is as follows:

- PBA: This activity was a phone bank conducted for identified Non-Federal candidates during the 1996 election cycle. The phone bank urged households to vote for Harris County Sheriff, Judicial, and County Attorney candidates.
- JBA: This activity was for the production, printing, and distribution of a brochure that promoted Non-Federal candidates (specifically judicial candidates). You have a copy of this brochure on file.
- TVB: This activity was for public access television interviews with Non-Federal candidates (again, specifically judges).

All three of these activities were originally reported to be 100% Non-Federal activities, but were re-reported as 100% Federal activities at your request.

I hope that this response thoroughly addresses your concerns about these expenditures. If you have any further questions or concerns, please feel free to contact me at (713)522-9361. Thank you very much.

Sincerely,

Jennie Duggan, Finance Director Harris County Democratic Party

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			2691
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(Revised 3/80) for each numbered line) Outstanding **LEMPHER** Paymont This Outstanding. Houris County Democratic Party Federal PAC Relative Regioning This Period housed between Materico el Ciceo This Period Perfort of This Period A Fig Name, Making Address and ZIP Code of Debior of Chadtor HCDP STATE PAC 50,06827 7252.03 42816.24 811 WESTHEINER 103 JOOPP XT, NORWOH paybach excess Nonfederal transfer B. Full Name, Making Address and ZIP Code of Debtor or Creditor Nature of Debt (Purpose): C. Full Name, Mailing Address and ZIP Code of Debtor or Craditor Nature of Debt (Furgoss): D. Full Name, Mailing Address and ZIP Code of Debtor or Creditin Nature of Debt (Purpose): E. Full Name, Making Address and ZIP Code of Debter or Creditor Natura of Debt (Purpose): F. Full Name, Making Address and ZIP Code of Debter or Cardior Notes of Dabt (Purpose): 1) SUBTOTALS This Period This Page (options) 2) TOTALS This Period (last page in this line only) 3) TOTAL CUTSTANDING LOANS from Schodule C (less page only) 4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)